

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

130 Clinton Road, Suite 202

Fairfield, NJ 07004

Telephone Number 973-575-0707

Attorneys For Secured Creditor

U.S. Bank National Association

Laura Egerman, Esq. (LE-8250)

In Re:

Kenneth G. McNeil,

Debtor.

Case No.: 15-14218-MBK

Chapter: 11

Judge: Michael B. Kaplan

**U.S. BANK NATIONAL ASSOCIATION'S NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

NOW COMES Creditor, U.S. Bank National Association, As Trustee, Successor In Interest to Wilmington Trust Company, As Trustee, Successor In Interest To Bank Of America National Association, As Trustee, Successor By Merger To Lasalle Bank National Association, As Trustee For Lehman XS Trust Mortgage Pass-Through Certificates, Series 2007-14h ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 251 WOODLAWN AVE, TRENTON New Jersey 08609. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements

to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

RAS Citron, LLC

Attorneys for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone No.: 973-575-0707

By: /s/ Laura Egerman
Laura M. Egerman, Esquire
Bar ID: LE-8250
Email: legerman@rasnj.com

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CERTIFICATION OF SERVICE

1. I, Laura Egerman, Esq., represent U.S. Bank National Association in this matter.
2. On May 12, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: *Notice Of Debtor's Request For Forbearance Due To The Covid-19 Pandemic*.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: May 6, 2020

RAS Citron, LLC

Attorneys for Secured Creditor

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone No.: 973-575-0707

By: /s/ Laura Egerman

Laura M. Egerman, Esquire

Bar ID: LE-8250

Email: legerman@rasnj.com

| Name and Address of Party Served | | | Relationship of Party to the | Mode of Service |
|--|--------|---|------------------------------|--|
| | | | Case | |
| Scott E. Kaplan Law Offices of Scott E. Kaplan, LLC 5 South Main Street PO Box 157 Allentown, NJ 085010157 | | | Attorney for Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |
| Kenneth G. McNeil 52 S. Olden Avenue Trenton, NJ 08609 | | | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other |
| United States Trustee Office of the United States Trustee One Newark Center Suite 2100 Newark, NJ 07102 | | | U.S. Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |
| Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) | | |

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| Keith A. Holmes 34 Tall Oaks Dr Laurel Springs, NJ 08021-4829 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) | | |
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| U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102 | | | U.S. Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*) |